



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

DEVAL L. PATRICK
Governor

MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH
Commissioner

August 29, 2014

Mr. Brian Ribeiro
Homeland Builders, Inc.
465 Sykes Road
Fall River, MA 02720

RE: Fall River
Transmittal No.: X258312
Application No.: SE-13-040
Class: *SM-25*
FMF No.: 363011
AIR QUALITY PLAN APPROVAL

Dear Mr. Ribeiro:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Waste Prevention, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the proposed operation of your existing cabinet fabrication facility located at 465 Sykes Road in Fall River, Massachusetts (“Facility”).

This Application was submitted as allowed for by Administrative Consent Order No. ACOP-SE-13-9003-7, dated September 17, 2013, and in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

The Permittee currently operates a commercial cabinetry manufacturing facility. Administrative Consent Order No. ACOP-SE-13-9003-7, dated September 17, 2013, paragraph 8.A. directed the Permittee to operate in compliance with the requirements stated in Plan Approval 4P01030, dated November 6, 2001, unless and until the Permittee applies for and receives revised emission limits for the Facility. In this Application (SE-13-040), the Permittee has proposed new operational and emission limits for the Facility. This Approval SE-13-040 supersedes and replaces Air Quality Approval 4P01030, dated November 6, 2001 in its entirety.

Emission Unit Number 1 consists of woodworking operations using equipment such as saws and planers. These operations generate particulate matter that is controlled by a baghouse and cyclone, operated in series, to achieve 99% control. This combination of pollution control devices minimizes the amount of conditioned make-up air introduced into the Facility.

Emission Unit Number 2 includes two paint spray booths: one for paint, and the other for lacquer. Each booth is connected to each other via a common curing room. Both booths meet the design requirements of 310 CMR 7.03(16). Paints and lacquers are applied as received, except for the thinning of polyurethane coatings, and are included in the Table 2 emission limits.

Emission Unit Number 3 consists of two separated adhesive spray booths. Both booths meet the design requirements of 310 CMR 7.03(16). Adhesive are applied as received.

Emission Unit Number 4 consists of cleaning operations using acetone and VOC-containing solvents in one of the 4 booths describe above.

Facility equipment not subject to Plan Approval includes a natural gas fired boiler that has a heat input range below 10 MMBtu/hr and meets the exemption criteria contained in 310 CMR 7.02(2)(b)15. Best Available Control Technology is defined in Table 2.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	Woodworking Operations	n/a	Cyclone, Baghouse
2	Paint Spray Booth - Paint & Lacquer	n/a	Fabric Filter
3	Spray Booth - Adhesive	n/a	Fabric Filter
4	Solvent Cleaning	n/a	none

Table 1 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

3. **APPLICABLE REQUIREMENTS**

A. **OPERATIONAL, PRODUCTION and EMISSION LIMITS**

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2			
EU#	Operational / Production Limit	Air Con- taminant	Emission Limit ⁴
1	1. Achieve $\geq 99\%$ particulate matter control efficiency.	PM//PM ₁₀ /PM _{2.5}	0.42 TPY ⁵
2	2. VOC content of any paint and lacquer, shall not exceed the limits contained in Table 310 CMR 7.18(23)(e)1.	VOC	As contained in Table 310 CMR 7.18(23)(e)1.
	3. VOC usage, as contained in paints and lacquers used, shall not exceed 0.375 ton per month.		0.375 TPM
	4. VOC usage, as contained in paints and lacquers used, shall not exceed 2.25 tons per consecutive 12-month period.		2.25 TPY
	5. HAPs content of paints and lacquers shall be equal to or less than 2.72 pounds of HAP per gallon.	HAPs (single) ¹	≤ 2.72 lbs/gallon
	6. HAPs (single) usage, as contained in paints and lacquers used, shall not exceed 0.34 ton per month.		0.34 TPM
	7. HAPs (single) usage, as contained in paints and lacquers used, shall not exceed 2.00 tons per consecutive 12-month period.		2.00 TPY
	8. HAPs (total) usage, as contained in paints and lacquers used, shall not exceed 0.34 ton per month.	HAPs (total)	0.34 TPM
	9. HAPs (total) usage, as contained in paints and lacquers used, shall not exceed 2.00 tons per consecutive 12-month period.		2.00 TPY
3	10. VOC content of any adhesive shall be equal to or less than 5.10 pounds of VOC per gallon.	VOC	≤ 5.10 lbs/gallon
	11. VOC usage, as contained in adhesives used, shall not exceed 0.59 ton per month.		0.59 TPM
	12. VOC usage, as contained in paints and lacquers used, shall not exceed 3.50 tons per consecutive 12-month period.		3.50 TPY
	13. HAPs content of paints and lacquers shall be equal to or less than 2.12 pounds of HAP per gallon.	HAPs (single) ²	≤ 2.12 lbs/gallon
	14. HAPs (single) usage, as contained in adhesives used, shall not exceed 0.34 ton per month.		0.34 TPM

Table 2			
EU#	Operational / Production Limit	Air Con- taminant	Emission Limit ⁴
	15. HAPs (single) usage, as contained in adhesives used, shall not exceed 2.00 tons per consecutive 12-month period.		2.00 TPY
3	16. HAPs (total) usage, as contained in adhesives used, shall not exceed 0.34 ton per month.	HAPs (total)	0.34 TPM
	17. HAPs (total) usage, as contained in adhesives used, shall not exceed 2.00 tons per consecutive 12-month period.		2.00 TPY
	18. Non-criteria Pollutant (acetone) usage, as contained in adhesives used, shall not exceed 0.50 ton per month.	Non- criteria Pollutant (acetone)	0.50 TPM
	19. Non-criteria Pollutant (acetone) usage, as contained in adhesives used, shall not exceed 3.00 tons per consecutive 12-month period.		3.00 TPY
4	20. VOC content of any cleaning solvent shall be equal to or less than 6.28 pounds of VOC per gallon.	VOC	≤ 6.28 lbs/gallon
	21. VOC usage, as contained in cleaning solvents used, shall not exceed 0.67 ton per month.		0.67 TPM
	22. VOC usage, as contained in cleaning solvents used, shall not exceed 4.00 tons per consecutive 12-month period.		4.00 TPY
	23. HAPs content of any cleaning solvent shall be equal to or less than 2.90 pounds of HAP per gallon.	HAPs (single) ³	≤ 2.90 lbs/gallon
	24. HAPs (single) usage, as contained in cleaning solvents used, shall not exceed 0.30 ton per month.		0.30 TPM
	25. HAPs (single) usage, as contained in cleaning solvents used, shall not exceed 1.75 tons per consecutive 12-month period.		1.75 TPY
	26. HAPs (total) usage, as contained in cleaning solvents used, shall not exceed 0.30 ton per month.	HAPs (total)	0.30 TPM
	27. HAPs (total) usage, as contained in cleaning solvents used, shall not exceed 1.75 tons per consecutive 12-month period.		1.75 TPY
	28. Non-criteria Pollutant (acetone) usage, as contained in cleaning solvents used, shall not exceed 1.00 ton per month.	Non- criteria Pollutant (acetone)	1.00 TPM
	29. Non-criteria Pollutant (acetone) usage, as contained in cleaning solvents used, shall not exceed 6.00 tons per consecutive 12-month period.		6.00 TPY
Facility -wide	30. Not Applicable.	Opacity	0 percent

Table 2 Key:

EU# = Emission Unit Number
PM = Total Particulate Matter
PM₁₀ = Particulate Matter less than or equal to 10 microns in diameter
PM_{2.5} = Particulate Matter less than or equal to 2.5 microns in diameter
VOC = Volatile Organic Compounds
HAP (single) = maximum single Hazardous Air Pollutant
HAPs (total) = total Hazardous Air Pollutants.
TPM = ton per month
TPY = tons per consecutive 12-month period
≥ = Greater than or equal to
≤ = Equal to or less than
n/a = not applicable
lbs = pounds
CMR = Code of Massachusetts Regulations

Notes:

1. The largest single HAP is xylene.
2. The largest single HAP is toluene.
3. The largest single HAP is methanol.
4. Emission limits are “as applied”.
5. Based on 0.096 pounds per hour of controlled particulate emissions discharged to the atmosphere, and 8,760 hours of operation per year.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
1	1. The Permittee shall continuously monitor the dust level using flashing light and audible alarm indicators.
2	2. The Permittee shall monitor the inventory of the number of gallons of paints and lacquers each month.
3	3. The Permittee shall monitor the inventory of the number of gallons of adhesives each month.
4	4. The Permittee shall monitor the inventory of the number of gallons of cleaning solvents each month.
Facility-wide	5. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	6. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:

EU# = Emission Unit Number

Table 4	
EU#	Record Keeping Requirements
1	1. The Permittee shall maintain a monthly record of the hours of woodworking operations.
2	2. The Permittee shall maintain a monthly record of the paints and lacquers used.
3	3. The Permittee shall maintain a monthly record of the adhesives used.
4	4. The Permittee shall maintain a monthly record of the cleaning solvents used.
2, 3, 4	5. The Permittee shall maintain a record (e.g. Manufacturer's formulation data, Safety Data Sheet, etc.) of each formulation used, to include formulation density, VOC content by weight, total HAP content by weight, individual HAP content by weight and solids content by weight.
Facility-wide	6. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	7. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	8. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site.
	9. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	10. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	11. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	12. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	13. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

SOMP = Standard Operating and Maintenance Procedure
USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Southeast Regional Office of MassDEP, BWP Compliance and Enforcement (C/E) Chief by telephone (508) 946-2878, email sero.air@state.ma.us or fax (508) 946-2865 or (508) 947-6557 as soon as possible, but no later than three (3) business days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to C/E Chief at MassDEP within business (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP’s request.
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:
EU# = Emission Unit Number

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
1	1. The Permittee shall operate the existing cyclone and baghouse Pollution Control Devices (PCD) at all times when conducting woodworking operations, except as provided in Proviso 2 below.
	2. In the event of PCD(s) upset, malfunction, or routine maintenance, the Permittee may use the woodworking equipment's built in sawdust collection chambers to accumulate the PM pollutant. When the PCD(s) are returned to operational status, the PM pollutant that was collected by the woodworking equipment shall then be collected by the PCD.
2	3. The Permittee shall operate the existing spray booths consistent with 310 CMR 7.03(16) except for 310 CMR 7.03(16)(a). MassDEP recognizes the existing spray booths as meeting the criteria of an equivalent system as described in 310 CMR 7.03(16)(e).
3	4. The Permittee may reconcile VOC and HAP contained in any solvent waste shipped during the month when determining monthly emissions provided that verifiable records are maintained demonstrating the VOC and HAP content, and quantity present in the waste being shipped if reconciling monthly usage and emissions.
4	
Facility-wide	5. This Plan Approval supersedes the Air Quality Plan Approval 4P01030 dated November 6, 2001. The Air Quality Plan Approval 4P01030 dated November 6, 2001 shall be deemed null and void.

Table 6 Key:

EU# = Emission Unit Number
PCD = Pollution Control Device
PM = Particulate Matter
VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutants

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as "shanty caps" and "egg beaters." The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	25	1.0	10 - 10	100 - 200
2	38	1.4	33 - 33	70 - 100
3	37	1.5	50 - 50	70 - 100
3	37	1.5	50 - 50	70 - 100
4	37	1.0	50 - 50	70 - 100

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Dan Kamieniecki by telephone at (508) 946-2717, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Thomas Cushing
Permit Chief
Bureau of Waste Prevention

Enclosure

cc: Fall River Dept of Health
Fall River Fire Department
MassDEP/SERO – M. Pinaud
MassDEP/SERO – L. Black

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MassDEP/Boston – Y. Tian
Occuhealth, Inc. – P. Matonis